

EXHIBIT 7 –
Email Correspondence between
Department of Justice and
Attorney Card

ATTACHMENT 1 –
January 22, 2021
Correspondence re: Records

From: [Hollingsworth, Mary \(ENRD\)](#)
To: [Daniel Card](#)
Cc: [Strippoli, Briena \(ENRD\)](#)
Subject: Records due today
Date: Friday, January 22, 2021 9:21:37 AM

Mr. Card,

Under the court's January 15, 2021 order:

Defendants shall provide acquisition and disposition records for any and all animals added to or missing from their inventories since June 22, 2020, no later than January 22, 2021.

During Wednesday's inspection, your clients provided some documents to USDA regarding the whereabouts of some of the missing animals. However, the documents do not comply with the AWA regulations. According to the regulations, the records must contain the following information:

- the name and address of the person from whom the animal was acquired, or to whom the animal was sold or given
- the AWA license or registration number of that person
- if the person is not licensed or registered under the AWA, the document must include the vehicle license number and State and drivers license number and State for the person
- the date of acquisition/disposition of the animal

Please ensure that all records required to be provided today comply with the regulations.

Thank you,
Mary Hollingsworth

ATTACHMENT 2 –
January 21-23, 2021
Correspondence

From: [Daniel Card](#)
To: [Hollingsworth, Mary \(ENRD\)](#)
Cc: [Strippoli, Briena \(ENRD\)](#)
Subject: Re: U.S. v. Lowe - US retrieving Big Cats on January 24, 2020
Date: Saturday, January 23, 2021 3:27:56 PM

Thank you, Ms Hollingsworth. I will ask about this. We are currently in deposition but will get what information we have asap.

Dan

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From: Hollingsworth, Mary (ENRD) <Mary.Hollingsworth@usdoj.gov>
Sent: Saturday, January 23, 2021 2:25:56 PM
To: Daniel Card <dan@cardlawok.com>
Cc: Strippoli, Briena (ENRD) <Briena.Strippoli@usdoj.gov>
Subject: Re: U.S. v. Lowe - US retrieving Big Cats on January 24, 2020

Mr. Card,

Pat Craig did not fill out the forms. A veterinarian filled out the forms based on information provided by Lauren Lowe and Mr. Cowie. Again if your clients have any documentation that can establish that these are in fact the same cats, please provide it. If we know the birthdate or other distinguishing information, that may help clear this up.

Thank you,
Mary Hollingsworth

Sent from my iPhone

On Jan 22, 2021, at 7:45 PM, Daniel Card <dan@cardlawok.com> wrote:

The Lowes are certain Boo Boo went to TWAS on the date stated. My understanding is Mr Craig is the person who fills out the certificate as the receiving party. Do you have a copy you can send me?

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From: Hollingsworth, Mary (ENRD) <Mary.Hollingsworth@usdoj.gov>
Sent: Friday, January 22, 2021 2:58:23 PM
To: Daniel Card <dan@cardlawok.com>
Cc: Strippoli, Briena (ENRD) <Briena.Strippoli@usdoj.gov>
Subject: Re: U.S. v. Lowe - US retrieving Big Cats on January 24, 2020

Mr. Card,

Thank you for following up. The problem we have is that the Lowes provided the names of the tigers who went to TWAS for the health certificates that had to be prepared and submitted to the State and Boo Boo is not one of the names provided. If they have documentation that establishes that the tiger who was transferred under another name is Boo Boo, then we'd appreciate you sending that documentation.

Mary Hollingsworth

On Jan 22, 2021, at 10:46 AM, Daniel Card <dan@cardlawok.com> wrote:

Boo Boo went to TWAS on October 3.

Odeza mother is Dotty, which went to Tiger Haven on Sept 27.

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From: Daniel Card <dan@cardlawok.com>
Sent: Friday, January 22, 2021 7:44:01 AM
To: Strippoli, Briena (ENRD) <Briena.Strippoli@usdoj.gov>
Cc: Strippoli, Briena (ENRD) <Briena.Strippoli@usdoj.gov>; Hollingsworth, Mary (ENRD) <Mary.Hollingsworth@usdoj.gov>
Subject: Re: U.S. v. Lowe - US retrieving Big Cats on January 24, 2020

On way to facility and will ask tse questions. Where is the govt taking the cats?

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From: Strippoli, Briena (ENRD) <Briena.Strippoli@usdoj.gov>
Sent: Thursday, January 21, 2021 10:46:16 PM
To: Daniel Card <dan@cardlawok.com>
Cc: Strippoli, Briena (ENRD) <Briena.Strippoli@usdoj.gov>; Hollingsworth, Mary (ENRD) <Mary.Hollingsworth@usdoj.gov>
Subject: U.S. v. Lowe - US retrieving Big Cats on January 24, 2020

Mr. Card:

We recognize that you will not receive this until tomorrow, but wanted to make sure that you had it first thing when you returned to the office. Pursuant to the Court's order, we intend to pick-up all Big Cats one-year or younger and their respective mothers this Sunday, January

24, 2020. We expect to arrive in the morning, but we will firm-up details tomorrow and get back to you.

Based on the Defendants' December 15, 2020 Inventory, we anticipate picking-up the following 10 young tigers and their adult moms:

- Phoenix (aka Phenix) and her cubs Caesar and Mirage (born November 28, 2020)
- Tilly and her cub Pleiades (born May 8, 2020)
- Ima and her cubs Moose and Abby (born April 2, 2020)
- Gracie and her cubs Shadow and Chanel (born September 5, 2020)
- Boo Boo* and her cubs Maggie and Leigha (born March 27, 2020)
- Dot* and her cub Odeza (born May 6, 2020)

*We would like to flag issues with two of the adult tiger mothers. We'd appreciate it if you could clarify the discrepancies *prior to Sunday*.

1. Where is Boo Boo? She is listed as the mother of Maggie and Leigha, born on March 27, 2020, but is not included on the December 15, 2020 Inventory.
2. Please identify Odeza's correct mother. Dot is listed as the mother of Odeza, born May 6, 2020. However, this appears to be impossible because the veterinary records of Dr. Devine show that Dot died due to complications from giving birth a month later on June 21, 2020.
3. Lastly, should there be any recently-born cubs, please identify them and their respective mother as well.

Many thanks to your attention to this matter.

Briena L. Strippoli
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ATTACHMENT 3 –
January 24, 2021
Correspondence re: Gladys

From: [Hollingsworth, Mary \(ENRD\)](#)
To: [Daniel Card](#)
Cc: [Strippoli, Briena \(ENRD\)](#)
Subject: Re: Gladys
Date: Sunday, January 24, 2021 1:14:39 PM

Mr. Card,

Your clients represented in a document that you provided to us pursuant to our court-approved stipulation and that you filed with the WDOK that the mother is Gracie. We alerted you that we planned to take Gracie per your client's inventory and we did not hear back from you before this morning. Your client stated on Wednesday to the inspectors that the mother is Sasha. Now the mother is Gladys. Other than your client's changing story, we do not have any documentation, such as veterinary records, that supports your client's new statements.

At this point we request that you allow us to take Gracie per the documents that your clients prepared and that were filed with the court. If we cannot take Gracie, we reserve the right to seek relief from the court, and we will seek costs related to having to return to the Thackerville facility.

Mary Hollingsworth

Sent from my iPhone

On Jan 24, 2021, at 10:48 AM, Daniel Card <dan@cardlawok.com> wrote:

Ok. Wasnt the implication to the court that the cubs would stay with their mothers? Youre not taking the correct cat youre authorized to take.

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From: Daniel Card <dan@cardlawok.com>
Sent: Sunday, January 24, 2021 11:18:11 AM
To: Hollingsworth, Mary (ENRD) <Mary.Hollingsworth@usdoj.gov>
Cc: Strippoli, Briena (ENRD) <Briena.Strippoli@usdoj.gov>
Subject: Re: Gladys

Ok. Neither Grace or Gracie have ever had cubs. Gladys has been there a while. I suppose I'll send you a corrected inventory. She realized her mistake yesterday in deposition. If the goal is to keep cubs and mothers together taking Gracie doesn't achieve that end. But ok.

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From: Hollingsworth, Mary (ENRD) <Mary.Hollingsworth@usdoj.gov>

Sent: Sunday, January 24, 2021 11:10:29 AM
To: Daniel Card <dan@cardlawok.com>
Cc: Strippoli, Briena (ENRD) <Briena.Strippoli@usdoj.gov>
Subject: Re: Gladys

Mr. Card,

Gladys was not on the August 2020 or June 2020 inventory. We have no idea where that tiger came from. If you have veterinary records or something of that sort that establishes the mother is a different cat than the one your clients listed on the inventory, we'll review them now. Otherwise, we are taking Gracie.

Mary Hollingsworth

Sent from my iPhone

On Jan 24, 2021, at 10:05 AM, Daniel Card <dan@cardlawok.com> wrote:

I've asked. But the inventory is made by Lauren. She realized she made a mistake by mixing up two similar names. I suppose I could have her change the inventory and send it to you. I'm unclear how that is more official than my telling you now. I thought the purpose was to keep the cubs and mothers together. Gracie isn't the mother. You'll be taking a random cat.

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From: Hollingsworth, Mary (ENRD) <Mary.Hollingsworth@usdoj.gov>
Sent: Sunday, January 24, 2021 10:58:41 AM
To: Daniel Card <dan@cardlawok.com>
Cc: Strippoli, Briena (ENRD) <Briena.Strippoli@usdoj.gov>
Subject: Re: Gladys

Mr. Card,

Do you have any documentation that establishes that Gladys is the mother and that the inventory your clients provided is not accurate? If so, please provide it immediately. Otherwise, we need to go off the information that your clients originally provided to us.

Thank you,
Mary Hollingsworth

On Jan 24, 2021, at 9:52 AM, Daniel Card

<dan@cardlawok.com> wrote:

Ok. But you're taking the wrong cat. That doesn't seem to make sense. It was true and correct to the best of my knowledge. Of course I wasn't there when Gladys gave birth and im receiving conflicting information.

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From: Hollingsworth, Mary (ENRD)
<Mary.Hollingsworth@usdoj.gov>
Sent: Sunday, January 24, 2021 10:47:51 AM
To: Strippoli, Briena (ENRD) <Briena.Strippoli@usdoj.gov>;
Daniel Card <dan@cardlawok.com>
Subject: RE: Gladys

Mr. Card,

The December 16, 2020 inventory that your client produced does not list Gladys as the mother of shadow and chanel. You filed a declaration on December 22, 2020, stating that the inventory is "true and correct" to the best of your knowledge. Furthermore, on Thursday, January 21, 2021, my colleague Brie Strippoli emailed you the names of the cats that we are taking, which included Gracie, per the court's order based on your client's December 16, 2020 inventory. If you have received documentation that establishes that Gladys is the mother and not Gracie, please provide it immediately. Otherwise, we are going to work off the inventory that your clients produced.

Mary

From: Daniel Card <dan@cardlawok.com>
Sent: Sunday, January 24, 2021 9:34 AM
To: Hollingsworth, Mary (ENRD)
<MHollingsw@ENRD.USDOJ.GOV>; Strippoli, Briena (ENRD)
<BStrippoli@ENRD.USDOJ.GOV>
Subject: Gladys

The USDA is taking Gracy and it is Gladys who us the mother of shadow and chanel. Please tell them.

Thx

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ATTACHMENT 4 –
January 24-26, 2021
Correspondence

From: [Hollingsworth, Mary \(ENRD\)](#)
To: [Daniel Card](#)
Cc: [Strippoli, Briena \(ENRD\)](#)
Subject: RE: Acquisition and Disposition Records
Date: Tuesday, January 26, 2021 12:10:51 AM

Mr. Card,

Please see 9 C.F.R. § 2.75(b)(1) for the requirements for acquisition and disposition records.

In light of the fact that the Court ordered your clients to produce acquisition and disposition records that comply with the AWA regulations by January 22, we would appreciate your immediate assistance.

We need all acquisition records for any and all animals added to and disposition records for any and all animals missing from the Lowes' June, August, and December inventories. Any animal that has been added either through birth or received from another individual and any animal who has died or has been given/sold to another individual must be accounted for in records that comply with the AWA regulations. For example, on July 8, 2020, the Lowes were cited for failure to provide 34 acquisition and disposition records. The Lowes were provided a copy of the inspection report, but it is also available online and in our PI filings. To date, the government has not received these documents. Additionally, between the August 21 and December 16 inventories, the Lowes acquired some wolves. Acquisition records are needed for those animals. Another example is Daniel. We need an acquisition record for him that identifies his mother and includes his siblings. We also need a disposition record for him.

Thank you,
Mary Hollingsworth

From: Daniel Card <dan@cardlawok.com>
Sent: Monday, January 25, 2021 8:18 AM
To: Hollingsworth, Mary (ENRD) <MHollingsw@ENRD.USDOJ.GOV>
Cc: Strippoli, Briena (ENRD) <BStrippoli@ENRD.USDOJ.GOV>
Subject: RE: Acquisition and Disposition Records

Can you provide a citation re what you're looking at to determine what they gave you was non-compliant please?

Also I do not know which "dozens" of A&D records are allegedly missing in order to have a fruitful discussion about it. Please advise.

Thanks,

Dan

From: Hollingsworth, Mary (ENRD) <Mary.Hollingsworth@usdoj.gov>
Sent: Sunday, January 24, 2021 12:01 AM
To: Daniel Card <dan@cardlawok.com>
Cc: Strippoli, Briena (ENRD) <Briena.Strippoli@usdoj.gov>
Subject: Acquisition and Disposition Records

Mr. Card,

We are following up on the Court's January 15, 2021 order, which contained the following provision:

"Defendants shall provide acquisition and disposition records for any and all animals added to or missing from their inventories since June 22, 2020, no later than January 22, 2021."

On January 22, 2021, we alerted you that the few documents that your clients provided to the APHIS inspectors during the January 20, 2021 inspection do not comply with the AWA regulations. Those regulations require:

- the name and address of the person from whom the animal was acquired, or to whom the animal was sold or given
- the AWA license or registration number of that person
- if the person is not licensed or registered under the AWA, the document must include the vehicle license number and State and drivers license number and State for the person
- the date of acquisition/disposition of the animal

However, we have not received the corrected documents. In addition, we are missing dozens of acquisition and disposition records. Please provide those documents right away.

Mary Hollingsworth
Senior Trial Attorney
Wildlife & Marine Resources Section
Environment & Natural Resources Division
United States Department of Justice
999 18th Street, South Terrace, Suite 354
Denver, CO 80202
(303) 844-1898

ATTACHMENT 5 –
January 29, 2021
Correspondence

From: [Hollingsworth, Mary \(ENRD\)](#)
To: [Daniel Card](#)
Cc: [Strippoli, Briana \(ENRD\)](#)
Subject: United States v. Lowe- Jan. 15, 2021 order
Date: Friday, January 29, 2021 3:32:41 PM

Mr. Card,

We are following up on the court's January 15, 2021 order. Per the court's order, Defendants must meet the requirements of 9 C.F.R. §§ 1.1. and 2.40 by today. Please provide us the name and contact information for the veterinarian your clients have hired as their attending veterinarian and the written program of veterinary care developed with that veterinarian. A few friendly reminders, under 9 C.F.R. § 1.1, an attending veterinarian must have "training and/or experience in the care and management of the species being attended." Also, the requirements for the written program of veterinary care are set out in 9 CFR § 2.40(b).

At this point, Defendants are one week late providing us with the "acquisition and disposition records for any and all animals added to or missing from their inventories since June 22, 2020." As we noted in our January 22, 2021 email, the few documents Defendants did provide to the APHIS inspectors do not comply with AWA regulations. To date, they have not been corrected. And as we described in our January 25, 2021 email, there are still a significant number of missing records. If we do not have all of the required documents by Monday, February 1, 2021, we plan to move to enforce the court's order.

Thank you,

Mary Hollingsworth
Senior Trial Attorney
Wildlife & Marine Resources Section
Environment & Natural Resources Division
United States Department of Justice
999 18th Street, South Terrace, Suite 354
Denver, CO 80202
(303) 844-1898

ATTACHMENT 6 –
February 3, 2021
Correspondence re: Bob Stiles
email

From: [Hollingsworth, Mary \(ENRD\)](#)
To: [Daniel Card](#)
Cc: [Strippoli, Briena \(ENRD\)](#)
Subject: RE: Bob Stiles email
Date: Wednesday, February 3, 2021 12:29:00 AM

Mr. Card,

Dr. Fryer apparently contacted USDA a few days ago. She can share with you what she discussed. USDA sent her the court's January 15, 2021 order. The order was also served on her by certified mail consistent with points 5 and 8 of the court's order. As a general matter, USDA will be in touch with the veterinarian from time to time to ensure compliance with the AWA and to check on the care being provided to animals at the facility as they would with any other veterinarian who is employed as an attending veterinarian.

The court required Defendants to retain "a qualified veterinarian under formal arrangements consistent with the requirements of 9 C.F.R. §§ 1.1, 2.40, no later than January 29, 2021." Under 9 C.F.R. § 2.40(a)(1), "formal arrangements shall include a written program of veterinary care." If Defendants have a PVC that complies with 2.40(a), (b), please send it to us right away. Otherwise, USDA can follow-up with Dr. Fryer about the formal arrangements.

Mary Hollingsworth

From: Daniel Card <dan@cardlawok.com>
Sent: Monday, February 1, 2021 4:59 PM
To: Hollingsworth, Mary (ENRD) <MHollingsw@ENRD.USDOJ.GOV>; Strippoli, Briena (ENRD) <BStrippoli@ENRD.USDOJ.GOV>
Subject: Bob Stiles email

Please forward me the email Mr Stiles sent to my client's vet.

Thank you,

Dan

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ATTACHMENT 7 –
February 3-4, 2021
Correspondence

From: [Hollingsworth, Mary \(ENRD\)](#)
To: [Daniel Card](#)
Cc: [Strippoli, Briena \(ENRD\)](#)
Subject: Re: U.S. v. Lowe- meet and confer
Date: Thursday, February 4, 2021 7:28:32 PM

Mr. Card,

No one has made any determination because we have insufficient information. Once USDA is provided with the required information and documentation, which includes the written program of veterinary care, USDA will review the documents and information and make a determination. It is the Lowes' burden to gather the required information about her qualifications before hiring her as an attending veterinarian. The problem is that the court gave your clients a deadline of last week to employ a qualified veterinarian and prepare a written program of veterinary care. So really we should already have all of this information.

Mary Hollingsworth

Sent from my iPhone

On Feb 4, 2021, at 4:53 PM, Daniel Card <dan@cardlawok.com> wrote:

Ma'am, I am not under the impression PETA makes the determination. My point was I don't have a CV but this isn't her first foray into big cats (or working with the USDA). We are trying to work with the government but neither you nor I are in a position to qualify a vet. The USDA made a determination she isn't qualified? I'm happy to produce a CV when I receive it.

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From: Hollingsworth, Mary (ENRD) <Mary.Hollingsworth@usdoj.gov>
Sent: Thursday, February 4, 2021 5:42:23 PM
To: Daniel Card <dan@cardlawok.com>
Cc: Strippoli, Briena (ENRD) <Briena.Strippoli@usdoj.gov>
Subject: Re: U.S. v. Lowe- meet and confer

Mr. Card,

USDA makes determinations about attending veterinarians, not PETA. Moreover, the qualifications for preparing a CVI are not the same as the qualifications for an attending veterinarian. As we've stated in emails and on the phone, under the AWA regulations she must have experience or training in the care and management of the species being attended. On the veterinary clinic website, there is a list of species she treats, most of which are not among those at Thackerville. So it's not obvious to us her training and experience in the specific species at the Thackerville facility. If you provide me the name of the facility in Newcastle,

we'll look it up. Please provide information that demonstrates how she has training or experience in the actual species at the Thackerville facility.

Thank you,
Mary Hollingsworth

Sent from my iPhone

On Feb 4, 2021, at 4:24 PM, Daniel Card <dan@cardlawok.com> wrote:

Dr. Allyson Fryer is going to Thackerville tomorrow. She will sign the contract tomorrow consistent with regulations, and has been working on a plan of care for species which will be completed tomorrow. She will also look at the animals mentioned in the last inspection report. I will provide the vet records within 7 days. Dr. Fryer has treated exotic animals since 2006 and is the vet for a primary sanctuary in Newcastle. I think on the phone I said she was the vet for Tiger Safari but that was incorrect and my mistake. I got potential vets mixed up. Her clients consist of treating Savannah Cats and larger cats, and PETA hired her to do the health certificates in September when PETA took 4 of the cats from Wynnewood. She will send me a CV when she can, however she is clearly comfortable and competent treating the animals Tiger King Park has. Apparently PETA agreed last year.

I am following up regarding unwanted breeding and other documentation and hope to have that information to you ASAP.

Thanks,

Dan

From: Hollingsworth, Mary (ENRD) <Mary.Hollingsworth@usdoj.gov>

Sent: Wednesday, February 3, 2021 4:55 PM

To: Daniel Card <dan@cardlawok.com>

Cc: Strippoli, Briena (ENRD) <Briena.Strippoli@usdoj.gov>

Subject: RE: U.S. v. Lowe- meet and confer

Let's plan on 10am eastern. We'll give you a call.

Thanks,
Mary Hollingsworth

From: Daniel Card <dan@cardlawok.com>

Sent: Wednesday, February 3, 2021 2:12 PM
To: Hollingsworth, Mary (ENRD) <MHollingsw@ENRD.USDOJ.GOV>
Cc: Strippoli, Briena (ENRD) <BStrippoli@ENRD.USDOJ.GOV>
Subject: Re: U.S. v. Lowe- meet and confer

I am moving today. I'm pretty open tomorrow.

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From: Hollingsworth, Mary (ENRD) <Mary.Hollingsworth@usdoj.gov>
Sent: Wednesday, February 3, 2021 12:00:51 AM
To: Daniel Card <dan@cardlawok.com>
Cc: Strippoli, Briena (ENRD) <Briena.Strippoli@usdoj.gov>
Subject: U.S. v. Lowe- meet and confer

Mr. Card,

What is your availability tomorrow (Wednesday) for a meet and confer regarding a motion to enforce the court's January 15, 2021 order? We would like to address the following:

1. Failure to comply with point 4 of the court's order. We have pointed out compliance issues with some of the records that were provided by Defendants, which have not been remedied. Additionally, there are still a number of missing documents, including those we identified in our January 25, 2021 email.
2. Potential failure to comply with point 3 of the court's order. The court required Defendants to retain a "qualified attending veterinarian under formal arrangements" consistent with the AWA regulations by January 29, 2021. We requested the written program of veterinary care developed with the veterinarian on January 29, 2021, and have not received it yet. Also, if you have documentation that establishes that the veterinarian meets the requirements of 9 CFR 1.1, including that she "has received training and/or experience in the care and management of the species being attended," including Big Cats, please send that as well. If your clients have met these requirements, then we can omit this issue from the motion.
3. Potential failure to comply with point 5 of the court's order. Several animals were in need of veterinary care as of January 20, 2021. Defendants are required to provide "complete and accurate veterinary records" within 7 days of any animal being treated by a veterinarian. If the animals have been treated, please provide us with the required veterinary records and we can omit this from the motion.

4. Also, we wanted to flag one more issue. Under the parties' stipulation, Defendants are prohibited from acquiring any animals without leave of court. As we discussed on the phone a few weeks ago, acquisition under the AWA includes births. The inspectors noted that numerous female animals were being housed with males as of January 20, 2021. If the animals have not been spayed or neutered, they should be separated immediately to ensure that Defendants remain in compliance with the court-approved stipulation.

Mary Hollingsworth